

GENERAL SYNOD
DIOCESAN SYNOD MOTIONS
AGE VERIFICATION FOR PORNOGRAPHY WEBSITES

Summary

The motion asks synod to note the harms associated with access to pornography by children, to call for legislative approaches to age verification and for better social and educational programmes. This paper summarises those issues in turn. It first summarises the evidence on the social and health impacts of pornography on children, including both the significant extent to which exposure to pornography is now widespread among children and the harms (including attitudes towards women, sex and relationships and body image) to which this exposure has been linked.

It then considers the current and developing legislative context, including consideration of the Church's interventions to date, and some of the limits of age verification. It concludes with a summary of additional resources and approaches on which further social and educational programmes might draw in the future.

The social and health impacts of pornography on children and young people
Exposure of children to pornography

1. There is widespread exposure to pornography among children. Different studies use different definitions of pornography and methodologies, but there is absolute consensus that exposure is high. The UK Safer Internet Centre reported findings from a 2016 study by the NSPCC, the Children's Commissioner for England and Middlesex University which found that "48% of 11–16 year olds had seen online pornography". Of those, just under half "reported viewing online pornography for the first time because it 'just popped up'" (i.e. they had not actively sought it out).¹
2. The exact scale is debatable, resting on definitions of pornography, and of what exposure entails (in terms of time spent, regularity of exposure, whether access is deliberative or inadvertent, etc.). A 2013 report from the Children's Commissioner noted a range in the academic literature of anywhere between 15 and 57% of children having been exposed to pornography within the last 3-12 months.² All studies agree that exposure is much higher among boys than girls and for older teenagers rather than younger ones.
3. Given the levels of exposure it is difficult to dispute the belief that existing efforts to limit access to children are proving inadequate. It is also worth noting in that context that pornography regularly tops the list of internet content-related concerns of both parents and children. UKCCIS referenced the 2010 EU Kids Online survey of 10,000 children aged 9–16 years which found that pornography "topped the list of online content-related concerns".³

¹ Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Leyva, R. and Horvath, M.A.H. (2016) I wasn't sure it was normal to watch it. London: NSPCC

² Horvath, M.A.H. Alys, L. Massey, K. Pina, A. Scally, M and Adler, J.R. (2013) "Basically... porn is everywhere" London: Children's Commissioner

³ UK Council for Child Internet Safety, Children's online activities, risks and safety. A literature review by the UKCCIS Evidence Group, October 2017, p 45

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4. It is unclear whether pornography is more extreme and violent today than in the past, but it is indisputable that children's access to pornography is fundamentally different from that of previous generations because of the prevalence of these materials on the internet and the relative ease by which those materials can be accessed. Ofcom's figures show that 87% of 14 year olds and 93% of 15 year olds own a smartphone.⁴

The impacts of pornography on children and young people

5. It is always difficult to establish definitive causal links between potentially harmful products and other social and health impacts. However, a string of studies have now linked pornography to unrealistic attitudes towards sex and body image in teenagers and to misogynistic attitudes, including treating women as sex objects.⁵ Several studies have found that exposure to sexualised material was related to the likelihood of young people engaging in more sexualised behaviour because they perceived more social pressure to have sex.⁶ At the most extreme end several studies have identified links between violent and extreme pornography and violent behaviour, including coercive sexual behaviour.⁷
6. It is also an issue of high concern among both children and parents. In written evidence submitted to the House of Commons Science and Technology Committee in 2019 Girlguiding reported from a survey of 1600 girls and young women that:

“70% of girls aged 13 to 21 thought the rise in online pornography contributes to women being treated less fairly”.

And that, of girls aged 17 to 21:

 - “80% thought it [pornography] encourages society to view women as sex objects;
 - 78% felt it encourages gender stereotyping of girls/women and boys/men;
 - 71% thought it normalises aggressive or violent behaviour towards women;
 - 71% thought it gives confusing messages about sexual consent;
 - 66% thought it puts pressure on girls to have sex before they are ready;
 - 65% thought it increases hateful language used about/to women;

⁴ OFCOM 'Children and parents: media use and attitudes report 2020/2021'
https://www.ofcom.org.uk/data/assets/pdf_file/0025/217825/children-and-parents-media-use-and-attitudes-report-2020-21.pdf

⁵ For a meta study summary of these reports see Martellozzo, E., Monaghan, A., Adler, J.R., Davidson, J., Leyva, R. and Horvath, M.A.H. (2016) I wasn't sure it was normal to watch it. London: NSPCC

⁶ See e.g. Bleakley, A., Henessy, M. & Fishbein, M. (2011). A model of adolescents' seeking of sexual content in their media choices. *Journal of Sex Research*, 48, 309–315.

⁷ Stanley, N., Barter, C., Wood, M., Aghtaie, N., Larkins, C., Lanau, A., Överlien, C. (2018). Pornography, sexual coercion and abuse and sexting in young people's intimate relationships: A European study. *Journal of Interpersonal Violence*, 33(19), 2919–2944. <https://doi.org/10.1177/0886260516633204>

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- 53% thought it coerced girls into sex acts because boys are copying what they see in pornography”.⁸

The legislative context

7. Age verification, and broader debates about the content and accessibility of pornography, has been the subject of intense public and political debate for many years. The Digital Economy Act 2017 sought to introduce age blocks among a number of other protections, but ran into criticism on multiple fronts and its key provisions in relation to pornography have not been enacted (that is to say the Act is on the statute books but the specific provisions that relate to pornography have never been brought into effect by the government).
8. Part 3 of the Digital Economy Act 2017 gave powers to an age-verification regulator to take action where a person is making pornographic material available. It has been criticised, however, on the basis that this targets only commercial pornography sites (the bigger corporate websites making revenue streams from pornographic content). It did not apply the same provisions to user-to-user or image search websites (i.e. social media sites on which pornographic content is posted or image hosting sites).
9. This is a significant flaw given that one 2019 survey of 1,000 16-17-year-olds in the UK found a higher proportion viewing material on social media (63%) and search engines (51%), compared to dedicated pornographic websites (47%).⁹
10. In relation to search engines one example of the flaw of not regulating in that space is that on Google, for example, rape and incest porn (and other highly violent and extreme content) is freely and easily accessible via a one-click search. Such a search provides images as well as links to numerous websites dedicated to rape and forced pornography.
11. It ought to be noted that there are a separate set of criticisms that have come from libertarian and other groups who are opposed to regulation on the basis of security and data sensitivity. Privacy advocates at the Open Rights Group argued that the collection of sensitive user data – a database of who requested access to what pornographic websites and when, would be inherently insecure and a target for hackers and blackmail.¹⁰ They also contested the desirability of state censorship of the internet more broadly.
12. Mindful more of the criticisms that it does not cover social media and image hosting sites, and with the benefit of several additional years of consultation and evidence, the government have introduced the Online Safety Bill (currently before parliament). This takes a broader approach to regulation,

⁸ From written evidence submitted by Girlguiding to the Parliamentary Science and Technology Committee <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/science-and-technology-committee/impact-of-social-media-and-screenuse-on-young-peoples-health/written/80608.html>

⁹ Thurman, N., & Obster, F. (2021). The regulation of internet pornography: What a survey of under-18s tells us about the necessity for and potential efficacy of emerging legislative approaches. *Policy Internet*, 13, 415–432. <https://doi.org/10.1002/poi3.250>

¹⁰ See their campaign website <https://www.ageverificationfacts.org.uk/> by Open Rights Group for details.

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including social media and search engines. It also introduces a new “duty of care” set of responsibilities on different platforms.

What the Church has done and is doing

13. The Church has been actively engaged on these issues in parliament for several years, including providing MPA Council consultation responses to both the original Online Harms White Paper (on which the Online Safety Bill is based) and on the publication of the Age Appropriate Design Code (AAD).
14. After the government dropped the original plans for age verification in the Digital Economy Act 2017, Lords Spiritual were vocal supporters of Baroness Kidron’s Private Member’s ‘Age Assurance (Minimum Standards)’ Bill in the House of Lords. This Bill would have required Ofcom to produce a code of conduct that set out minimum standards for any system of age assurance.
15. Lords Spiritual intend to fully engage in scrutiny and supporting amendments to strengthen the proposed Online Safety Bill in respect of children and young people. To that end the Archbishop of York is a signatory to a letter from faith leaders’ and children’s advocates laying out the case for a string of amendments including:

Protection for children wherever they are online, covering all services likely to be accessed by children

Mandatory standards of privacy, security and efficacy of age checking that is proportionate to risk and does not allow the sector to check their own homework

16. The Bishop of Oxford and his staff have been engaging with early scrutiny of the Bill and intend to follow its passage through the House of Lords.

The limitations of age restrictions

17. The introduction of age verification for access to websites containing pornography will not, on its own, completely safeguard children and young people under the age of 18 from being exposed to such content.
18. For one thing, the experience of other states that have brought in such restrictions are instructive. In France and Germany, despite legal requirements to introduce age restrictions and pressure from regulators, pornography platforms including major companies such as Pornhub (owned by MindGeek which has publicly stated its support for age verification, even developing its own age verification tool which has never been used) have failed to act in line with the new regulations. The Online Safety Bill does contain some enforcement mechanisms, including business disruption measures and fines for executives, but regulatory enforcement will not be easy, particularly given the often obscure ownership and control of corporations that focus on online content.
19. Another issue relates to concern that more people are accessing pornography in public rather than private spaces, where the content can be overlooked

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overheard by anyone who is nearby, including children.¹¹ On crowded public transport, for example, people watching pornography on a phone or a tablet, may give those in the vicinity no chance to avoid such content.

20. Similarly, children may be offered, or come across, pornography by being shown images or video by adults or older siblings or through having access to a shared space or a shared computer. Since some mainstream television programming (eg *Friends*) represents the consumption of pornography as an inevitable part of life and relationships, many children may expect that pornography is part of growing up and see no harm in trying to access it through older members of their family or peer group.
21. A third significant issue is that even children who have not accessed pornography themselves may be affected by the expectations and desires of others who have. There is particular concern about pressure to take sexually explicit images of themselves for others, which may be shared widely without consent, to engage in sexting, without perhaps knowing what particular words mean, and to become vulnerable to grooming and to revenge porn.
22. Research from The PHSE Association has shown that 'in the majority of cases, young people's first time viewing pornography was accidental. Over 60% of children aged 11-13 who had seen pornography said their viewing of it was unintentional'.¹²

Additional or alternative approaches

23. Age restriction is a useful tool in reducing exposure of children to pornography, but it is not a silver bullet in this regard. It will necessarily require other approaches, including within the education realm.
24. There is already good material on which to build in this respect. For example, the Department for Education's Statutory Guidance [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019542/Relationships Education Relationships and Sex Education RSE and Health Education.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1019542/Relationships_Education_Relationships_and_Sex_Education_RSE_and_Health_Education.pdf) (under Online and Media p.28) includes material that school children should know about including:
 - the impact of viewing harmful content.
 - that specifically sexually explicit material e.g. pornography presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners.
 - that sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including jail.

¹¹ See e.g. BBC Magazine article 'Is it OK to watch porn in public' 14 January 2017 <https://www.bbc.co.uk/news/magazine-38611265>

¹² See PSHE Association 'ADDRESSING PORNOGRAPHY THROUGH PSHE EDUCATION' https://sexualhealth.cht.nhs.uk/fileadmin/sexualHealth/contentUploads/Documents/Teacher_Briefing_-_Addressing_Pornography_through_PSHE_Education_0.pdf

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25. There are other resources to help parents talk to children about pornography. These include advice from the NSPCC¹³ Youthscape¹⁴ and the Children's Commissioner.¹⁵ The National Crime Agency's CEOP Education team also provide education training and resources.¹⁶ **Error! Hyperlink reference not valid.**
26. There may be more that can be done in dioceses, deaneries and parishes to increase dialogue with schools, teachers and all those who care for children at local level in order to make available sufficiently safeguarded spaces for children to share their experiences without judgement and enabled to ask questions, express concerns, and receive answers about pornography, relationships and sexual behaviour in age-appropriate terms. Where church-led, these spaces could be set in the context of Christian understanding of the human body, relationships of all kinds, respect and care for others, and the meaning of commitment to real human beings in the context of powerful emotions and desires.

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Secretary General
June 2022

¹³ <https://www.nspcc.org.uk/globalassets/documents/advice-and-info/online-pornography-keep-child-safe.pdf>

¹⁴ Rachel Gardner 'A Parent's Guide To Young People And Porn' Youthscape
<https://www.youthscape.co.uk/store/product/inappropriate-content>

¹⁵ Children's Commissioner 'Talking to your child about online sexual harassment: A guide for parents'
<https://www.childrenscommissioner.gov.uk/report/talking-to-your-child-about-online-sexual-harassment-a-guide-for-parents/>

¹⁶ See the National Crime Agency's CEOP Education team website <https://www.thinkuknow.co.uk/>